

APPENDIX B

DISCOVERY PLAN WORKSHEET

Tier I Pre-Settlement Discovery TO BE COMPLETED IN ALL CASES

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations:

Completion date for Phase I Discovery

as agreed upon by the parties:

(*See paragraph 7 of joint letter requirement*)

Status conference TBD by the court:

(*Generally 15 days post Tier I Discovery*)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:

(*Presumptively 15 days post status conference*)

All fact discovery completed by:

(*Presumptively 9 months after deadline for joining parties/amend the pleadings*)

Expert discovery completed by:

(*Presumptively 3 months after close of fact discovery*)

Final date to take first step in dispositive motion practice:

(*Parties are directed to consult the District Judge's individual rules regarding such motion practice.*)

(*Presumptively 30 days after close of discovery*)

Joint Proposed Pretrial Order to be submitted:

(*30 days after dispositive motion practice deadline*)